REMARKS

The FINAL Office Action of November 21, 2003 has been carefully considered. Reconsideration of this application is respectfully requested in view of the remarks below. Claims 1-20 are pending in this application. Of these, claims 1, 14, and 18 are independent claims. A first Amendment faxed March 24, 2003 amended the specification. A second Amendment faxed September 8, 2003 amended claims 1, 8, 14, and 18.

1. Response to Rejection Under 35 USC 103

The Office Action on page 2 rejects claims 1-8 and 10-20 under 35 U.S.C. 103(a) as being unpatentable over Rennison et al. (U.S. Patent No. 6,154,213, hereinafter referred to as Rennison). Applicant respectfully disagrees for the reasons discussed below.

As set forth in the Amendment faxed 9/8/03, Applicant's claimed invention is directed at a method, system, and article of manufacture for automatically generating a query, as described in detail in Applicant's specification in section F.3 (paragraph numbers 397-426). The system includes an entity extractor, a categorizer, and a query generator. The entity extractor identifies a set of entities in selected document content for searching information related thereto in an information retrieval system. The categorizer defines an organized classification of content with each class in the organization having an associated classification label that corresponds to a category of information in the information retrieval system.

Further in accordance with Applicant's invention, the categorizer assigns the selected document content a classification label from the organized classification of content. The query generator automatically formulates a query concerning the set of entities extracted by the entity extractor. In formulating the query, the query generator restricts the search at the information retrieval system to the category of information in the information retrieval system identified by the assigned classification label.

In contrast with Applicant's claimed invention, Rennison discloses a method for navigating through large document collections by "maintaining a constant density of visual information presented on a display device to the user at any given moment in time" (see Abstract). The method disclosed by Rennison segments a large

document collection into various units of information and provides "three different types of clues to the user: scale, context and an indication of the types of selected relationships between items of information in the information structure". (see column 3, lines 55-61)

More specifically, Rennison discloses that "the information structure of an information space is dynamically determined in response to a user's query and is a representation of the relationship between a collection of documents that satisfy the query" (see column 4, lines 43-47). Further, Rennison discloses that a user "creates queries by navigating through the 3D information space itself, which is dynamically repopulated with 3D graphical objects representing an information structure which is computed in response to the user's movements (query) in the 3D space" (see column 4, lines 57-61).

In rejecting independent claims 1, 14, and 18, the Office Action on pages 2-3 alleges that subject matter disclosed in columns 6, 8, 9, 17, 18, and 19 of Rennison render Applicant's invention obvious. Applicant respectfully disagrees. Unlike Rennison which discusses in column 18 systems in which "users navigate through [a] hierarchy to find a particular Topic of interest and the associated documents" (lines 36-38), Applicant claims in independent claims 1, 14, and 18: (a) the categorization of selected document content with an organized classification of document content to assign the selected document content a classification label, and (b) the formulation of a query to restrict a search to the category of information at an information retrieval system related to the assigned classification label concerning a set of entities automatically identified in the selected document content.

Further, Rennison discloses a system that uses a combination of traditional information retrieval methods (i.e., the maximization of precision and recall), static topic hierarchies that are used as "containers" of documents, and statistical clustering, "to create interconnected Topic hierarchies dynamically in response to a user query and a document set" (see column 18, lines 58-60). In contrast, Applicant does not dynamically generate an information space in response to a user's query, instead Applicant's invention claimed in independent claims 1, 14, and 18 concerns the automatic generation of a query from selected document content by, in part, (a) categorizing the selected document content, and (b) formulating a query to restrict a

search to a category of information at an information retrieval system.

In addition, as set forth in Rennison "information retrieval and query formation are controlled by movement through the information space [] from one graphical node [] to another" (see column 12, lines 36-44). Movement in the space either changes context or scope (see column 12, lines 45-67). Instead as claimed by Applicant in independent claims 1, 14, and 18, query formulation is performed automatically by restricting a search at an information retrieval system for information concerning a set of entities (automatically identified in selected document content) to a category of information in the information retrieval system identified by a classification label (assigned by categorizing the selected document content).

Accordingly, Applicant respectfully submits that independent claims 1, 14, and 18 are patentably distinguishable over Rennison. Insofar as claims 2-8, 10-13, 15-17, and 19-20 are concerned, these claims depend from one of now presumably allowable independent claims 1, 14, and 18 and are also believed to be in allowable condition.

2. Allowable Claims

Section 5 on page 7 of the Office Action indicates that claim 9 would be allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims. The undersigned appreciates this indication of allowable subject matter.

3. Fee Authorization And Extension Of Time

No additional fee is believed to be required for this amendment or response, however, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

4. Conclusion

In view of the foregoing remarks, reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is hereby requested to call Attorney for Applicant(s), Thomas Zell.

Respectfully submitted,

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